

# **EXHIBIT K**



**Selina P. Coleman**  
Direct Phone: +1 202 414 9220  
Email: scoleman@reedsmith.com

Reed Smith LLP  
1301 K Street, N.W.  
Suite 1000 - East Tower  
Washington, D.C. 20005-3373  
+1 202 414 9200  
Fax +1 202 414 9299  
reedsmith.com

April 5, 2023

**Via Email**

Joseph Guglielmo  
Carey Alexander  
SCOTT+SCOTT, Attorneys at Law, LLP  
The Helmsley Building  
230 Park Avenue, 17th Floor  
New York, NY 10169  
jguglielmo@scott-scott.com  
calexander@scott-scott.com

David Mitchell  
Arthur Shingler  
Robbins Geller Rudman & Dowd  
655 West Broadway  
Suite 1900  
San Diego, CA 92101  
davidm@rgrdlaw.com  
ashingler@rgrdlaw.com

Erin Green Comite  
SCOTT+SCOTT, Attorneys at Law, LLP  
156 South Main Street  
P.O. Box 192  
Colchester, CT 06415  
ecomite@scott-scott.com

Eric Dwoskin  
Robbins Geller Rudman & Dowd  
120 E. Palmetto Park Road  
Suite 500  
Boca Raton, FL 33432  
edowskin@rgrdlaw.com

Re: *Forth, et al. v. Walgreen Co.*, Case No. 1:17-cv-02246

Dear Counsel:

Today we are producing responsive, non-privileged documents on behalf of Walgreens' experts. We will email you a link to a secure FTP site that contains five separate production folders, which we are designating as confidential as branded in accordance with the Court's October 17, 2017 confidentiality order, including to safeguard all protected health information.

The Bates numbers for each production are as follows:

- Bill Hanifin: Walg\_Forth\_Hanifin00001 – Walg\_Forth\_Hanifin00097;
- James Hughes: Walg\_Forth\_Hughes00001 – Walg\_Forth\_Hughes01099;
- Michael Jacobs: Walg\_Forth\_Jacobs00001 – Walg\_Forth\_Jacobs01504;
- Kelly Nordby: Walg\_Forth\_Nordby00001 – Walg\_Forth\_Nordby00648;
- Jed Smith: Walg\_Forth\_Smith00001 – Walg\_Forth\_Smith00222.

April 5, 2023  
Page 2

ReedSmith

Each production folder has a separate password to open the zip file, as follows:

- Bill Hanifin: **566@44567jjFTGW**
- James Hughes: **wKahpXhags5S**
- Michael Jacobs: **sp4-rIN\*faDacRode+ec**
- Kelly Nordby: **z&wUfr14HOs@EfubraSP**
- Jed Smith: **78XA566@4!@44567jjF56@**

We anticipate making at least one more production of documents.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Michael Leib".

Michael S. Leib

cc: Selina Coleman (Reed Smith)  
Jessica Christensen (Reed Smith)  
Anthony Todd (Reed Smith)  
Caitlin Chambers (Reed Smith)  
Kristin Parker (Reed Smith)



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Fax +1 202 414 9299  
reedsmith.com

April 18, 2023

**Via Email**

Joseph Guglielmo  
Carey Alexander  
SCOTT+SCOTT, Attorneys at Law, LLP  
The Helmsley Building  
230 Park Avenue, 17th Floor  
New York, NY 10169  
jguglielmo@scott-scott.com  
calexander@scott-scott.com

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San Diego, CA 92101  
davidm@rgrdlaw.com  
ashingler@rgrdlaw.com

Erin Green Comite  
SCOTT+SCOTT, Attorneys at Law, LLP  
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ecomite@scott-scott.com

Eric Dwoskin  
Robbins Geller Rudman & Dowd  
120 E. Palmetto Park Road  
Suite 500  
Boca Raton, FL 33432  
edowskin@rgrdlaw.com

Re: *Russo, et al. v. Walgreen Co.*, Case No. 1:17-cv-02246

Dear Counsel:

Today we are producing documents on behalf of Walgreens' expert, Jed Smith, in response to Plaintiffs' third-party subpoena served on Mr. Smith and in response to Plaintiffs' April 14, 2023 email.

As noted in our April 18, 2023 email earlier today, to provide this information as swiftly as possible, we are producing these documents first via a secure FTP site, which we are designating as Confidential in accordance with the Court's October 17, 2017 confidentiality order. We then will make a formal production of these materials.

Plaintiffs' April 14, 2023 email requested information as to the information necessary to replicate specific tables in Mr. Smith's expert report. The chart below includes the file name of the query and the line number of that query that contains the methodology to replicate the analysis for the specified table.

April 18, 2023

Page 2

ReedSmith

Report Table	File Name	Line Number(s)
2	03 2015 Sample Data Creation With Comments	887
4	08 Report Tables With Comments	9
5	05 PSC Membership Fee Allocation Analysis With Comments	147
9	06 PBM Matching With Comments	51, 102, 154, 206, 257, 364
10	<i>No query: Table created by reviewing the produced named Plaintiffs' Excel files.</i>	N/A
11	08 Report Tables With Comments	19
12	<i>No query: table created by reviewing Hilton exhibits.</i>	N/A
16	<i>No query: table created by reviewing produced Connecticut Reconciliation Excel files.</i>	N/A
19	08 Report Tables With Comments	31
21	08 Report Tables With Comments	42
37	08 Report Tables With Comments	53
38	<i>No query: Table created by reviewing produced PBM data and named Plaintiffs' Excel files.</i>	N/A

Plaintiffs also requested information necessary to replicate the analysis in Appendix A. We welcome clarification from Plaintiffs on this request, as Appendix A contains an explanation of how the data was used and does not contain any separate summary or analysis of data.

Please let us know if you have any questions or need any support to access this production.

Very truly yours,



Selina Coleman

cc: Michael Leib (Reed Smith)  
 Jessica Christensen (Reed Smith)  
 Anthony Todd (Reed Smith)  
 Caitlin Chambers (Reed Smith)  
 Kristin Parker (Reed Smith)



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Fax +1 202 414 9299  
reedsmith.com

April 20, 2023

**Via Email**

Joseph Guglielmo  
Carey Alexander  
SCOTT+SCOTT, Attorneys at Law, LLP  
The Helmsley Building  
230 Park Avenue, 17th Floor  
New York, NY 10169  
jguglielmo@scott-scott.com  
calexander@scott-scott.com

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Re: *Russo, et al. v. Walgreen Co.*, Case No. 1:17-cv-02246

Dear Counsel:

Today we are producing Bates-stamped versions of documents we shared on April 18, 2023, on behalf of Walgreens' expert, Jed Smith, in response to Plaintiffs' third-party subpoena served on Mr. Smith and in response to Plaintiffs' April 14, 2023 email. We will email you a link to a secure FTP site that contains the production, which we are designating as Confidential in accordance with the Court's October 17, 2017 confidentiality order.

The Bates numbers for the production are Walg\_Forth\_Smith00278 – Walg\_Forth\_Smith00324. The password to the zip file is: **thoma\$owl2hitr#4wIqa.**

Very truly yours,

Selina Coleman

April 20, 2023

Page 2

ReedSmith

cc: Michael Leib (Reed Smith)  
Jessica Christensen (Reed Smith)  
Anthony Todd (Reed Smith)  
Caitlin Chambers (Reed Smith)  
Kristin Parker (Reed Smith)